

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

BAOYANG CHEN,	:	CASE NO. 1:17-cv-00460-MRB
		Judge Michael R. Barrett
Plaintiff,	:	Magistrate Judge Stephanie K. Bowman
 v.	:	
GSC OPPORTUNITIES, LP, et al.,	:	<b>PLAINTIFF’S MOTION TO MODIFY</b>
		<b>SCHEDULING ORDER</b>
Defendants.	:	

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Now comes Plaintiff Baoyang Chen, through counsel, and hereby moves the Court to modify the Scheduling Order 45 days to extend Plaintiff’s expert disclosure and report of experts (“Plaintiff’s Expert Disclosure”), Defendant’s expert disclosure and report of experts (“Defendant’s Expert Disclosure”), and rebuttal report of experts (“Rebuttal Expert Report”). In support thereof, Plaintiff states:

1. On April 11, 2024, the parties submitted their Rule 26(f) report.
2. On April 23, 2024, the Court entered the Calendar Order establishing the following deadlines, among others:
  - a. Plaintiff’s Expert Disclosure: June 30, 2024 (Actual date July 1, 2024 due to the 30<sup>th</sup> falling on a Sunday)
  - b. Defendant’s Expert Disclosure: September 30, 2024
  - c. Rebuttal Expert Report: November 30, 2024
3. Plaintiff has not found a liability expert to date on the issue of legal duty/duty of care, but is actively searching for such an expert, and an additional 45 days is needed to secure an expert and complete Plaintiff’s Expert Disclosure.

4. The additional 45 days will not disrupt the other case deadlines and the case will stay on track for a July 2025 trial.
5. The new deadlines would be:
  - a. Plaintiff's Expert Disclosure: August 15, 2024
  - b. Defendant's Expert Disclosure: November 14, 2024
  - c. Rebuttal Expert Report: January 14, 2024
6. Defendant will not be prejudiced by the requested extensions.

Accordingly, Plaintiff requests a 45-day extension of the above expert deadlines.

Respectfully submitted,

/s/ Christopher D. Cathey  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1st day of July, 2024, I electronically filed the foregoing with the Clerk of the Court by using the Court's CM/ECF E-Filing System, which will send a notice of electronic filing to all counsel of record at their respective designated e-mail addresses, including:

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/s/ Christopher D. Cathey  
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